

Message

From: Charmley, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FB1828FB00AF42FFB68B9E0A71626D95-CHARMLEY, WILLIAM]
Sent: 1/17/2017 1:49:56 PM
To: Grundler, Christopher [grundler.christopher@epa.gov]
Subject: RE: Blog on Future of Light-duty Emission and Fuel Economy Standards

You are welcome.

I sent Bob an email this morning, thanking him for sending it to me. For some reason I thought Bob had become very ill, and that was why he left the Administration. He sent me back the following response;

From: Bob [mailto:bobsussman1@comcast.net]
Sent: Tuesday, January 17, 2017 8:28 AM
To: Charmley, William <charmley.william@epa.gov>
Subject: RE: Blog on Future of Light-duty Emission and Fuel Economy Standards

Happy New Year to you, Bill. You and your team have done great work on these issues. Best of luck under the new team.

Robert M. Sussman
 3133 Connecticut Avenue, NW #2405
 Washington DC 20008
 (202)-758-2227 (H)
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bobsussman1@comcast.net

From: Grundler, Christopher
Sent: Tuesday, January 17, 2017 8:43 AM
To: Charmley, William <charmley.william@epa.gov>
Cc: Simon, Karl <Simon.Karl@epa.gov>; Hengst, Benjamin <Hengst.Benjamin@epa.gov>; Orlin, David <Orlin.David@epa.gov>; Olechiw, Michael <olechiw.michael@epa.gov>; Moran, Robin <moran.robin@epa.gov>; Bolon, Kevin <Bolon.Kevin@epa.gov>; Barba, Daniel <Barba.Daniel@epa.gov>
Subject: Re: Blog on Future of Light-duty Emission and Fuel Economy Standards

Thx for sharing this.

Christopher Grundler, Director
 Office of Transportation and Air Quality
 U.S. Environmental Protection Agency
 202/564-1682 (Washington DC)
 734/214-4207 (Ann Arbor MI)

On Jan 17, 2017, at 8:10 AM, Charmley, William <charmley.william@epa.gov> wrote:

Dear all –

I do not subscribed to Bob Sussman's blog, and I have not spoken with Bob in probably 4 years. I had heard that Bob's health was declining, but maybe that is not correct.

For those of you who don't recall, Bob worked in EPA for the Obama Administration from 2009-2013. I did a quick search, and Bob is now a visiting professor of law at both Georgetown and Yale, and he has his own firm now called "Sussman and Associates"

Bob did not work on the light-duty GHG standards, but he does understand mobile sources, and he understands the Title II of the CAA.

I think his blog is well worth reading – and it will make you feel good. For example:

"The industry's indignation should be taken with a large grain of salt. Although agreeing to the MY 2022-25 standards in 2012, the industry had recently questioned their achievability and undoubtedly hoped they would be weakened by the Trump administration. While the industry may be disappointed that the Obama EPA accelerated its MTE timetable, this was well within EPA's discretion. The only legitimate question is whether, by moving quickly, EPA compromised the quality of its technical and economic analysis.

This is demonstrably not the case. Despite industry's picture of a deeply flawed process, EPA in fact developed a comprehensive technical record, conducted a thorough assessment of the issues, solicited public comment on multiple occasions and responded at length to the industry critique of its draft analyses. Having made a considered judgment that the MY 2022-2025 emission and efficiency targets are technologically feasible and beneficial to consumers, EPA had no reason to delay closing out the MTE on its own terms — recognizing that the next administration could take another bite at the apple if it disagreed with the Agency's analysis."

"Despite industry's claims that the EPA gave short shrift to its comments in its rush to complete the MTE, the agency in fact conducted extensive additional modeling using the latest data on market conditions, fuel costs, and technology performance. This new analysis along with a full response to the industry comments was summarized in the 268 page proposed determination and presented more fully in a 719 page Technical Support

Document (TSD). The EPA's conclusion was that the industry arguments did not hold water and that the current standards are in fact feasible and cost-effective."

"Against this backdrop, it's jarring to see the industry arguing that further improvements in gasoline engine technologies will be difficult to achieve and that cost and performance shortcomings will block consumer acceptance of zero emission vehicles. This deeply defensive message is at odds with the industry's impressive recent record of improved vehicle performance and fuel economy gains, its financial strength and massive technical capabilities, and rapid changes in technology and the marketplace that it professes to welcome."

From: Robert Sussman [mailto:outlook_383C136A85535DF1@outlook.com] **On Behalf Of** Robert Sussman

Sent: Monday, January 16, 2017 10:52 AM

Subject: Blog on Future of Light-duty Emission and Fuel Economy Standards

Enclosed is my latest blog, discussing the recent EPA determination to retain the CO2 emission and fuel efficiency standards for light-duty vehicles and the obstacles the Trump administration will face if it decides to revisit the determination and weaken the standards. The blog also comments on the posture of the auto industry and its future path on climate and fuel economy.

Feedback welcome!

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